

May 21, 2020

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Demand-Side Management and Energy Efficiency Rider 12, Increasing Residential Rates and Decreasing Non-Residential Rates;
Docket No. 2020-83-E: Letter-in-Lieu of Comments**

Dear Ms. Boyd:

Walmart Inc. ("Walmart") timely filed a Petition to Intervene in this case on March 12, 2020, which was granted by Public Service Commission ("Commission") Directive Order issued on March 25, 2020. By way of this letter, Walmart provides limited Comments (due on May 22, 2020, per the Directive Order issued May 14, 2020).

Walmart has reviewed Duke Energy Carolinas, LLC's ("DEC" or "Company") filing and supporting documentation, as amended on May 11, 2020, and has no objection to DEC's proposed changes. Walmart also notes that DEC proposes to maintain, without change, the opt-out provisions of Rider EE. Walmart strongly supports the opt-out concept in light of Walmart's extensive, self-funded energy efficiency ("EE")/demand-side management ("DSM") investments.


In recent years, however, Walmart has requested that DEC work with interested parties to modify its opt-out procedures (Rider EE(SC), pages 1 and 2) so that they are more consistent with its sister company, Duke Energy Progress ("DEP"), in South Carolina. The DEP tariff and procedures in this regard are more streamlined and efficient in Walmart's view (*see* DEP Rider DSM/EE-11, Sheet 1 of 2). Walmart reaffirms its willingness and desire to work cooperatively with DEC, the Office of Regulatory Staff ("ORS"), and other parties to evaluate harmonizing the DEC and DEP opt-out processes as soon as practicable. Walmart therefore respectfully requests that the Commission encourage DEC to engage with Walmart, ORS, and other interested parties in resolving this issue.

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By copy of this letter, I am serving all parties of record via Electronic Mail. Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

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SUE/sds
Attachment
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-83-E

IN RE:

Application of Duke Energy Carolinas, LLC
for Approval of Demand-Side Management
and Energy Efficiency Rider 12, Increasing
Residential Rates and Decreasing Non-
Residential Rates

CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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Dated: May 21, 2020